

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No. 1:23CR00128AGF
)
SHAWN STOCKARD,)
)
Defendant.)

**MOTION OF THE UNITED STATES
FOR PRELIMINARY ORDER OF FORFEITURE**

COMES NOW the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tim J. Willis, Assistant United States Attorney for said District, and moves this Court to issue a Preliminary Order of Forfeiture in the above-captioned case. In support thereof, the United States sets forth the following:

1. On June 17, 2024, Defendant Shawn Stockard pled guilty to a violation of Title 18, United States Code, Section 922(a)(3) and also agreed, in writing in the Guilty Plea Agreement, to the forfeiture of certain property as set forth below (the "Subject Property"):

- 1) Sig-Sauer, model 1911, 10 mm pistol, serial number 54E001928.
- 2) Sig-Sauer, model P238, .380 pistol, serial number 27B062518.
- 3) Glock, model 34 Gen 5, 9mm pistol, serial number BLAL815.
- 4) Glock, model 45, 9mm pistol, serial number BSFB623.
- 5) Kimber, model Custom II, 10 mm pistol, serial number KF66258.
- 6) Colt, model Colt Auto, .25 caliber pistol, serial number 386390.
- 7) Smith & Wesson, model 60, .38 caliber revolver, serial number R120433.
- 8) Colt, Anaconda, .44 caliber revolver, serial number MM68345.

- 9) North American Arms, NAA22, .22 cal. revolver, serial number BTT00700.
- 10) Smith & Wesson, model 27-2, cal. .357 mag. revolver, serial no. N177038.
- 11) Colt, model King Cobra, .357 magnum revolver, serial number KV7390.
- 12) Smith & Wesson, model 17, .22 caliber revolver, serial number K417286.
- 13) Smith & Wesson, model 12, caliber 38 revolver, serial number C237817.
- 14) Smith & Wesson, model 27-2, cal. .357 mag. revolver, serial no. N465547.
- 15) Smith & Wesson, model 27-2, cal. .357 mag. revolver, serial number N477271.
- 16) Smith & Wesson, model 631 Lady Smith, caliber .32 revolver, serial no. BEZ4386.
- 17) Sig-Sauer, model P238, .380 semi-automatic pistol, serial number 27A027481.
- 18) Firearms Import & Export, model Titan Tiger, .38 special revolver, serial no. N017459.
- 19) Smith & Wesson, model 686-1, caliber .357 mag. revolver, serial number AVN5960.
- 20) Colt, model Army 1901, caliber .38 revolver, serial number 199762.
- 21) Beretta USA Corp. model 96, .40 caliber semi-automatic pistol, serial number BER208280.
- 22) Sig-Sauer, model 1911, caliber .45 semi-automatic pistol, serial number 54B156809.
- 23) Heritage Manufacturing Corp. Rough Rider, caliber .22 revolver, serial number P39093.
- 24) Smith & Wesson, model 27-3, caliber .357 revolver, serial number REG0028.
- 25) Smith & Wesson, model 629-1, caliber .44 magnum revolver, serial number AJC7448.
- 26) Colt, model Cobra, caliber .38 special revolver, serial number RA534019.
- 27) Smith & Wesson, model 37 Airweight, caliber .38 revolver, serial number 530518.
- 28) Colt, model Mustang Plus II, caliber .380 semi-automatic pistol, serial number RS42082.
- 29) Taurus, model The Judge, caliber .45/.410 revolver, serial number BR618355.
- 30) M.A.B, model D, caliber .32 semiautomatic pistol, serial number 114990.
- 31) Smith & Wesson, model 66, caliber .357 magnum revolver, serial number 2K82288.
- 32) Smith & Wesson, model 686, caliber 357 magnum revolver, serial number AFJ7927.
- 33) Auto Ordnance Corporation, model 1911, .38 pistol, serial number AOC31761.

- 34) Makarov, model IJ-70, caliber 9mm semi-automatic pistol, serial number BB4935.
- 35) Makarov, model Soviet Issue, caliber 9mm pistol, serial number KO18936.
- 36) Smith & Wesson, model 27, caliber .357 magnum revolver, serial number 83820.
- 37) Crvena Zastava, model 70, caliber .32 semi-automatic pistol, serial number 123908.
- 38) CZ, model CZ75 BD, caliber 9mm semi-automatic pistol, serial number B505198.
- 39) Magnum Research, Desert Eagle, caliber .50 semi-automatic pistol, serial number 108723.
- 40) Smith & Wesson, model 351C, caliber .22 revolver, serial number CXT6252.
- 41) Heritage Manufacturing Inc., Barkeep, caliber .22 revolver, serial number 1BH534276.
- 42) Smith & Wesson, model 27, caliber .357, serial number 102557.
- 43) Springfield Armory, model Hellcat, caliber 9mm pistol, serial number BA493485.
- 44) Smith & Wesson, model 629-1, caliber .44 magnum revolver, serial number AES2776.
- 45) Smith & Wesson, model 648, caliber .22 revolver, serial number BEZ9937.
- 46) Colt, model Python, caliber .357 magnum revolver, serial number PY201689.
- 47) Smith & Wesson, model 629-3, caliber .44 magnum revolver, serial number BFB0610.
- 48) Beretta (Pietro S.P.A.) model 950, caliber .22 pistol, serial number 70685CC.
- 49) Sig-Sauer, model Mosquito, caliber .22 semi-automatic pistol, serial number F232666.
- 50) Kahr Arms (Auto Ordinance), model 1921A1, caliber .45 serial number KJ0771.
- 51) PTR Industries, model PTR 32KC, caliber 7.62 rifle, serial number FC01901.
- 52) North American Arms, Wasp, caliber .22 magnum revolver, serial number VTO7846.
- 53) Winchester, model Ranger 120, 12-gauge shotgun, serial number L1463559.
- 54) Keltec (CNC Industries), model RFB, caliber 7.62 rifle, serial number T4L79.
- 55) German Sports Guns, model GSG-MP40P, caliber 9mm pistol, serial number A871533.
- 56) Olympic Arms, model MFR, caliber 5.56/.223 semi-automatic rifle, serial number AW4451.

- 57) Aero Precision, model X15, caliber 5.65/.223 semi-automatic rifle, serial number X085359.
- 58) Palmetto State Armory, model PA-15, caliber 5.56/.223 rifle, serial number SCD206054.
- 59) Heckler & Koch, model HK 91, caliber 7.62 semi-automatic rifle, serial no. 41-061020.
- 60) North American Arms, model NAA-225, caliber .22 revolver, serial number S5161.
- 61) Derya Arms, model VRBP 100, 12-gauge semiautomatic shotgun, serial number R159829.
- 62) Imbel, model FZ-SA, caliber 7.62 semi-automatic rifle, serial number PAC1191.
- 63) Arsenal, model SAM7, caliber 7.62 semi-automatic rifle, serial number AC544408.
- 64) Seekins Precision, model SP223, caliber 5.56/.223 rifle, serial number SP8852.
- 65) Hesse LTD, model H91, caliber .308 semi-automatic rifle, serial number G003022.
- 66) Sharps Brothers Man., model Hell Breaker, caliber 5.56/.223 rifle, serial number 01-00976.
- 67) Remington, model 870 Express Magnum, 20-gauge shotgun, serial number A150544U.
- 68) Mega, model Gator, caliber 5.56/.223 semi-automatic rifle, serial number MGA0541.
- 69) Israel Weapon Industry (IWI), model Uzi 'B", caliber 9mm, serial number SA65786.
- 70) Izhmash, model Saiga-20, 20-gauge semi-automatic shotgun, serial number H07590809.
- 71) Sig-Sauer (Sig-Arms), model P226, caliber .40/.357, serial number UU762314.
- 72) Colt, model Officer ACP, caliber .45 semi-automatic pistol, serial number SF11035.
- 73) American Industries, Calico model M100, caliber .22 rifle, serial number 008353.
- 74) Colt, model Government MKIV (Series 80), caliber.45 pistol, serial number 5540928.
- 75) Sun City Machinery, model Stevens320, 12-gauge shotgun, serial number 15142K.
- 76) Romar Cugir, model FPK Dragunov, caliber 7.62 rifle, serial 'number C-8979-75.
- 77) Anderson Man., model AM-15, caliber 5.56/.223 rifle, serial number 14140316.
- 78) Remington, model 1100, 20-gauge shotgun, serial number 150195X.
- 79) Colt, model Gold Cup National Match, caliber .45, serial number SN19076E.

- 80) Zastava Kragujevac, model M90, caliber 7.62 rifle, serial number 055237.
- 81) Sig-Sauer, model P229, caliber .40/.357 semi-automatic pistol, serial number AL56121.
- 82) Colt, model Officer's ACP, caliber .45 semi-automatic pistol, serial number SF27796.
- 83) Sun City Machinery, model Stevens 320, 20-gauge shotgun, serial number 150373S.
- 84) Colt, model Lightweight Commander, caliber .45 pistol, serial number FL08752E.
- 85) Mossberg, model 935, 12-gauge shotgun, serial number AM076748.
- 86) Colt, model Officer Model Match, caliber .22 revolver, serial number 831134.
- 87) Remington Arms Company, model 1100, 12-gauge shotgun, serial number R080708V.
- 88) Astra, model 1921, caliber 9mm semi-automatic pistol, serial number 80800.
- 89) Colt, model 1911 U.S. Army, caliber .45 semi-automatic pistol, serial number 508127.
- 90) Century Arms, model CP1975 Sporter, caliber 7.62 rifle, serial number GPC505047.
- 91) Taurus, model PT1911, caliber .45 semi-automatic pistol, serial number NCM72215.
- 92) Spikes Tactical, model Crusader ST15, .223/5.56 caliber pistol, serial number DV019312.
- 93) Colt, model 1911 U.S. Army, caliber .45 pistol, serial number 2350044.
- 94) Colt, model 1911, caliber .45 semi-automatic pistol, serial number DGN070.
- 95) Colt, model Marine CQBP, caliber .45, pistol, serial number 2830798.
- 96) Sota Arms, model SA15, caliber .223/5.56, serial number 007647.
- 97) Spikes Tactical, model ST15, caliber .223/5.56 pistol, serial number NSL144135.
- 98) Heckler and Koch, model P7M8, caliber 9mm pistol, serial number 97065.
- 99) Colt, model 1911, caliber .45 semi-automatic pistol, serial number SDG047.
- 100) Century Arms, model C39, caliber 7.62, serial number 39WM-001216.
- 101) Colt, model 1903 Pocket Hammerless, caliber .32, serial number 3966.
- 102) Norinco, model SKS, caliber 7.62 semi-automatic rifle, serial number 12245101.
- 103) Chongqing Jianshe, model JTS-12, 12-gauge shotgun, serial no. EM1751504.
- 104) Sig-Sauer, model P229C, caliber 9mm pistol, serial number 55B041856.

- 105) Smith & Wesson, model M629-2, caliber .44 magnum revolver, serial number BED5787.
- 106) Colt, model 1908 Pocket Hammerless, caliber .380 pistol, serial number 29589.
- 107) Ruger, model Ruger-57, caliber 5.7x28 semi-automatic pistol, serial number 641-26883.
- 108) Palmetto State Armory, model PA-15, caliber .223/5.56, rifle, serial number SCD206082.
- 109) Rock Island Armory, model M1911-A1FS, caliber 9mm pistol, serial number RIA1223803.
- 110) IMEZ, model Tiger, caliber 7.62 semi-automatic rifle, serial number 199438871.
- 111) Glock, model 17, caliber 9mm semi-automatic pistol, serial number BPFN345.
- 112) Anderson, model AM-15, caliber .223/5.56 semi-automatic pistol, serial number 14161233.
- 113) Sig Sauer, model P229, caliber 9mm semi-automatic pistol, serial number 55E004509.
- 114) Chinese, model SKS, caliber 7.62 semi-automatic rifle, serial number P2085.
- 115) Colt, model 1908 Pocket Hammerless, caliber .380 pistol, serial number 20956.
- 116) Franchi, model 500, 12-gauge shotgun, serial number R04677.
- 117) Marlin, model 70PSS, caliber .22 semi-automatic rifle, serial number 97429599.
- 118) Sig-Sauer, model P220 Elite, caliber .45 semi-automatic pistol, serial number G15778.
- 119) Chongqing Jianshe, model JTS-12, 12-gauge shotgun, serial number MK2011224.
- 120) Bushmaster, model Carbon 15, caliber .223 rifle, serial number CBC079777.
- 121) Masterpiece Arms, model MPA971, caliber 9mm rifle, serial number CO356.
- 122) Browning, model A5, 12-gauge shotgun, serial number 1162W19350.
- 123) Dan Wesson, model Commander Classic, caliber .45 pistol, serial number 1502643.
- 124) Microtech, model STG-556, caliber .223 semiautomatic rifle, serial number 600-P000319.
- 125) Romarm Cugir, model Wasr-10, caliber 7.62, serial number 1972D13354.
- 126) Glock, model 21, caliber .45 semi-automatic pistol, serial number WTG317.

- 127) Bond Arms, model Century 2000, .45/.410 derringer, serial number 57422.
- 128) Beretta, model 21A, caliber .22 semi-automatic pistol, serial number BSC03861.
- 129) Glock, model 48, caliber 9mm semi-automatic pistol, serial number BLWD390.
- 130) Glock, model 21 Gen 4, caliber .45 semi-automatic pistol, serial number WTG317.
- 131) Glock, model 45, caliber 9mm semi-automatic pistol, serial number BKDV613.
- 132) Glock, model 27 Gen 4, caliber .40 semi-automatic pistol, serial number KSP781296.
- 133) Glock, model 19, caliber 9mm semi-automatic pistol, serial number BREM330.
- 134) Smith & Wesson, model 66-2, caliber .357 magnum revolver, serial number AVV5663.
- 135) Colt, model Combat Commander, caliber .45, serial number FC02398E.
- 136) Colt, model Government, caliber .45 semi-automatic pistol, serial number SS21985E.
- 137) Sig Sauer, model P938, caliber 9mm semi-automatic pistol, serial number 52A021650.
- 138) Smith & Wesson, model 66, caliber .357 revolver, serial number 6K62411.
- 139) Smith & Wesson, model 617, caliber .22 revolver, serial number BEF5375.
- 140) Smith & Wesson, model 625-7, caliber .45 revolver, serial number CER6423.
- 141) Springfield Armory, model 1911A1, caliber .45 pistol, serial number N449859.
- 142) Glock, model 43X, caliber 9mm semi-automatic pistol, serial number BRSW556.
- 143) Smith & Wesson, model 629-4, caliber .44 magnum revolver, serial number BUA1855.
- 144) Smith & Wesson, model 669, caliber 9mm semi-automatic pistol, serial number TAU6956.
- 145) Smith & Wesson, model 650, caliber .22 revolver, serial number ADN8540.
- 146) Smith & Wesson, model 40-1, caliber .38 special revolver, serial number DBJ7413.
- 147) Smith & Wesson, model New Century, caliber .44 revolver, serial number 23821.
- 148) Smith & Wesson, model 629-3, caliber .44 magnum revolver, serial number BPW2569.
- 149) Smith & Wesson, model 627, caliber .357 magnum revolver, serial number

BEK5054.

- 150) Smith & Wesson, model 60-3, caliber .38 revolver, serial number BDA8587.
- 151) Smith & Wesson, model 686-4, caliber .357 magnum revolver, serial number BRW1858.
- 152) Smith & Wesson, model 629, caliber .44 magnum revolver, serial number N871788.
- 153) Smith & Wesson, model 640-1, caliber .357 magnum revolver, serial number DKS9979.
- 154) Smith & Wesson, model 624, caliber .44 special revolver, serial number ALU0102.
- 155) Smith & Wesson, model 66, caliber .357 magnum revolver, serial number 6K80574.
- 156) Smith & Wesson, model 686, caliber .357 magnum revolver, serial number ACL3247.
- 157) Smith & Wesson, model 649, caliber .38 special revolver, serial number AYT2524.
- 158) Colt, model King Cobra, caliber .357 magnum revolver, serial number KK0994.
- 159) Smith & Wesson, model 31-1, caliber .32 revolver, serial number 817874.
- 160) Smith & Wesson, model 651, caliber .22 revolver, serial number ADH3205.
- 161) Sig-Sauer, model P239, caliber 9mm pistol, serial number SA-28144.
- 162) Sig-Sauer, model P229 Elite, caliber .357 pistol, serial number AM175453.
- 163) Smith & Wesson, model 657, cal. .41 magnum revolver, serial number ANE4452.
- 164) Taurus, model 731, caliber .32 revolver, serial number U137901.
- 165) Smith & Wesson, model 60-1, caliber .38 special revolver, serial number ALU6934.
- 166) Smith & Wesson, model 629-4, caliber .44 magnum revolver, serial number BTA0822.
- 167) Smith & Wesson, model 651-1, caliber .22 revolver, serial number LH50005.
- 168) Smith & Wesson, model 40, caliber .38 special revolver, serial number 29179.
- 169) Sig-Saur, model P229, caliber 9mm semi-automatic pistol, serial number AE22610.
- 170) Colt, model Government, caliber .45 semi-automatic pistol, serial number ELCEN11850.
- 171) Smith & Wesson, model 66-1, caliber .357 magnum revolver, serial number 64K8756.
- 172) Colt, model Officers Model 38, caliber .38 semi-automatic pistol, serial number

367252.

- 173) Smith & Wesson, model 648, caliber .22 revolver, serial number BFA1831.
- 174) Smith & Wesson, model 27, caliber .357 magnum revolver, serial number S163813.
- 175) Smith & Wesson, model 629-1, caliber .44 magnum revolver, serial number BBA1862.
- 176) Glock GMBH, model 30, caliber .45 semi-automatic pistol, serial number MPS214.
- 177) Smith & Wesson, model 10, caliber .38 special revolver, serial number S865245.
- 178) Smith & Wesson, model 610, caliber 10 mm revolver, serial number BFA5636.
- 179) Smith & Wesson, model 1917, caliber .45 revolver, serial number 136830.
- 180) Smith & Wesson, model 657-4, caliber .41 magnum revolver, serial number CCW7044.
- 181) Colt, model Commander, caliber .45 semi-automatic pistol, serial number CJ45841.
- 182) Kimber, model Raptor II, caliber .45 semi-automatic pistol, serial number K187307.
- 183) Colt, model New Police, caliber .32 revolver, serial number 91.
- 184) Sig-Sauer, model P226, caliber 9mm semi-automatic pistol, serial number UU711370.
- 185) Smith & Wesson, model K-200, caliber .38 revolver, serial number V388853.
- 186) Smith & Wesson, model 38-2, caliber .38 special revolver, serial number CBC9911.
- 187) Colt, model Government, .45 caliber pistol, serial number SS13796.
- 188) Smith & Wesson, model 66-3, caliber .357 magnum revolver, serial number BEE0806.
- 189) Colt, model Concealed Carry Officer, caliber .45 pistol, serial number LF10451E.
- 190) Smith & Wesson, model 66, caliber .357 magnum revolver, serial number 15K8306.
- 191) Colt, model Officers ACP, caliber .45 semi-automatic pistol, serial number SF01358E.
- 192) Glock, model 29 Gen 4, caliber 10mm semi-automatic pistol, serial number BFUK698.
- 193) Smith & Wesson, model 617-1, caliber .22 revolver, serial number CAD7043.
- 194) Colt, model Government, caliber .45 semi-automatic pistol, serial number SS17192.
- 195) Glock, model 35, caliber .40 semi-automatic pistol, serial number FGN752.

- 196) Walther, model PP, caliber .32 semi-automatic pistol, serial number 984386.
- 197) Smith & Wesson, model 649-3, caliber .357 magnum revolver, serial number CCY1816.
- 198) Smith & Wesson, model 17, caliber .22 revolver, serial number K214909.
- 199) Smith & Wesson, model 629, caliber .44 magnum revolver, serial number N866688.
- 200) Smith & Wesson, model 40, caliber .38 S&W revolver, serial number 14552.
- 201) Smith & Wesson, model 686-1, caliber .357 magnum revolver, serial number AWW7973.
- 202) Smith & Wesson, model 1000, 12-gauge shotgun, serial number FS89831.
- 203) Waffen Works, model AK-47, caliber 5.54, serial number WW03639.
- 204) Franchi, model 48AL, 12-gauge shotgun, serial number B12810.
- 205) Browning, model BPS, 20-gauge shotgun, serial number 36687NT162.
- 206) Romar Cugir, model Wasr-10, caliber 7.62 semi-automatic rifle, serial no. 1971CS0936.
- 207) Colt, model Officer Model, caliber .32 semi-automatic pistol, serial number G42762.
- 208) Franchi, model 48AL, 12-gauge shotgun, serial number FF12827.
- 209) Astra, model 1921, caliber 9mm semi-automatic pistol, serial number 79068.
- 210) Franchi, model 48AL, 20-gauge shotgun, serial number L07665.
- 211) Smith & Wesson, model 19, caliber .38 special revolver, serial number S66680.
- 212) Colt, model Custom Auto, 12-gauge shotgun, serial number C011337.
- 213) Browning, model BPS, 12-gauge shotgun, serial number 055372W121.
- 214) Smith & Wesson, model 1905, caliber .45 revolver, serial number 12727.
- 215) Sharps Brothers Manufacturing, .223/5.56 semiautomatic rifle, serial number JACK11328.
- 216) Assorted firearms ammunition.

2. Accordingly, the United States now moves pursuant to Rule 32.2(b) of the Federal Rules of Criminal Procedure for the entry of a Preliminary Order of Forfeiture, forfeiting the Subject Property to the United States pursuant to the notice provided in the Indictment.

3. Based upon the evidence set forth in the Plea Agreement and presented at the plea hearing held on June 17, 2024, the United States has established the required nexus between the Subject Property and the offenses to which Defendant has pleaded guilty. Accordingly, the Subject Property is subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

4. Pursuant to Rule 32.2(b)(6) and Title 21, United States Code, Section 853(n), upon the issuance of a Preliminary Order of Forfeiture ordering the forfeiture of specific property, the United States shall publish notice of the Order and send direct notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

5. Upon adjudication of all third-party interests, this Court shall enter a Final Order of Forfeiture pursuant to Rule 32.2(c) and Title 21, United States Code, Section 853(n), in which the Subject Property will be ordered forfeited to the United States to be disposed of according to law.

6. Pursuant to Federal Rule of Criminal Procedure 32.2(b)(4)(A), the Court's order becomes final as to the Defendant upon sentencing. To the extent the order directs Defendant to forfeit specific property, it remains preliminary as to third parties until the ancillary proceeding is concluded under Rule 32.2(c).

7. Pursuant to Federal Rule of Criminal Procedure 32.2(b)(4)(B), the Court must include the forfeiture when orally announcing the sentence or must otherwise ensure Defendant knows of

the forfeiture at sentencing. The Court must also include the forfeiture order, directly or by reference, in the judgment, but the Court's failure to do so may be corrected at any time under Rule 36.

WHEREFORE, the United States respectfully requests that this Court determine that Subject Property as set forth in paragraph 1 above is subject to forfeiture and enter a Preliminary Order of Forfeiture. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States also requests authority to conduct any discovery permitted by the Federal Rules of Civil Procedure in order to identify, locate, or dispose of any property subject to forfeiture under this order, including depositions, interrogatories, subpoenas, and requests for production. The United States submits herewith its proposed Preliminary Order of Forfeiture.

Dated: June 18, 2024

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Tim J. Willis

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Tim J. Willis

Tim J. Willis, #62428MO
Assistant United States Attorney